

FILED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

UNITED STATES DISTRICT COURT

for the

AUG 30 2016

District of New Mexico

JF

United States of America)	MATTHEW J. DYKMAN
v.)	
Christopher James Baum (year of birth 1980, Social)	Case No. 16mj 3350 CLERK
Security number xxx-xx-4684))	
)	
)	
)	

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 16 through 24, 2016 in the county of Bernalillo in the
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2113	Bank robbery, attempted bank robbery

This criminal complaint is based on these facts:

See attached affidavit.

 Continued on the attached sheet.*Paul D. Wright**Complainant's signature*

Paul D. Wright, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 8/30/16City and state: Albuquerque, NM

Steven G. Yarbrough
Steven G. Yarbrough
v.s. Magistrate Judge

*Judge's signature**Printed name and title*

AFFIDAVIT OF PAUL D. WRIGHT

Your Affiant, Paul D. Wright, having been first duly sworn, does hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been so employed since 1998. I am therefore authorized to investigate federal criminal offenses. I am currently the Bank Robbery Coordinator for the Albuquerque Division of the FBI and as such have participated in investigations of suspected violations of federal bank robbery law, including Title 18, United States Code (USC), Section (§) 2113. My other experience prior to being a Special Agent includes more than two years as a military policeman, for a total of twenty years of experience in law enforcement. The information set forth in this affidavit has been derived from my own investigation or communicated to me by other sworn law enforcement officers or from reliable sources.

2. This affidavit will show that there is probable cause in support of an arrest warrant and criminal complaint against Christopher James Baum (year of birth 1980, Social Security number xxx-xx-4684), for violations of 18 USC § 2113, that being bank robbery.<sup>and attempted bank robbery. PW
Suf</sup>

3. The statements contained in this affidavit are based upon your Affiant's investigation, training and experience and information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant and criminal complaint, your Affiant has not included each and every fact known to me concerning this investigation. Your Affiant has set forth only the facts which your Affiant believes are necessary to establish probable cause to support an arrest warrant and

criminal complaint against Christopher Baum, in violation of 18 USC § 2113.

4. This investigation concerns alleged violations of 18 USC § 2113.
5. 18 USC § 2113 prohibits taking, by force and violence or by intimidation, money in the possession of a bank or credit union.
6. On August 16, 2016, at approximately 1:30 p.m., surveillance camera images at a Walgreens pharmacy located at 2625 San Pedro Drive (Dr) NE, Albuquerque, New Mexico (NM), captured a gray four-door sedan arriving in the parking lot of the pharmacy and parking in the southeast area of the parking lot. Based on the images and on the descriptions of witnesses, the sedan was believed to be a gray Nissan with its entire front bumper and grill missing. Shortly thereafter, surveillance images captured by a branch of Bank of the West located at 5901 Menaul Boulevard (Blvd) NE, Albuquerque, NM, at the intersection of San Pedro Dr NE and Menaul Blvd NE, next door to the Walgreens, captured an individual walking southbound in the branch parking lot, i.e., coming from the direction of the Walgreens. Based on surveillance camera images and the descriptions of witnesses, the subject was a white male approximately 6'1" or 6'3" tall and of medium build. The subject wore what appeared to be an orange or reddish-brown wig. After walking southbound in the parking lot, the subject circled to the west and the north, towards the entrance of the branch.
7. The subject entered the branch of Bank of the West at approximately 1:32 p.m. The subject approached the teller counter and announced, "This is a robbery." The subject demanded "hundreds, fifties and twenties" and ordered the teller not to give him a tracker or dye pack. The subject leaned on the teller counter. The subject looked down and did not make eye contact with the teller. The teller complied with the subject's robbery demands, taking United States (US) currency from her teller drawer and handing it over

to the subject. As she did so, the teller also made eye contact with two other employees, in an effort to signal to them that something was wrong. One of the employees exited his office and approached the subject. This employee stood in close proximity to the subject and looked intently at him. The subject took the currency from the teller and exited the branch. The subject ran northbound, back to the Walgreens parking lot, and got into the gray vehicle. The gray vehicle departed shortly thereafter, exiting the parking lot, turning onto Cagua Dr NE and proceeding northbound until it was out of view of bank employees. The FBI prepared and distributed a press release containing images of the subject of the bank robbery. Local news media outlets broadcast news of the robbery and images of the subject on television and on the Internet.

8. The Federal Deposit Insurance Corporation (FDIC) insures the deposits of Bank of the West, wherefore the latter institution is a bank as defined under 18 USC § 2113. Bank of the West suffered a financial loss in the robbery.
9. On August 19, 2016, at approximately 4:45 p.m., a white male subject entered the branch of Bank of the West located at 2101 Eubank Blvd NE, Albuquerque, NM. Witnesses described the subject as a white male between 6'0" and 6'5" tall, of slender build and with his head shaved. The subject wore a baseball cap. Witnesses estimated the subject's age from his late twenties to his late thirties. The subject approached the teller counter and made verbal robbery demands of two tellers. The subject leaned on the teller counter. The subject's demands included a demand for "hundreds, fifties and twenties," as well as an order not to give him a dye pack or tracker. The two tellers complied with the subject's demands. Each of them took US currency from his or her respective teller drawer and handed the currency over to the subject. The subject took the currency, exited the branch and fled southbound on foot until he was out of sight of bank employees. The FBI prepared and distributed a press release containing images of the subject of the bank robbery. Local news media outlets broadcast news of the robbery and images of the

subject on television and on the Internet.

10. The FDIC insures the deposits of Bank of the West, wherefore the latter institution is a bank as defined under 18 USC § 2113. Bank of the West suffered a financial loss in the robbery.
11. On August 19, 2016, the Albuquerque Police Department (PD) interviewed a witness in a robbery case, unrelated to the robberies discussed in this affidavit. The witness voluntarily informed that he or she had seen photographic images on the Internet of the subject of a bank robbery which had occurred earlier the same day. The witness added that he or she recognized the subject as a male acquaintance known only to him or her by the nickname "Ghost." The Albuquerque PD subsequently obtained a search warrant for the witness' cellular telephone. Upon searching the phone, the Albuquerque PD located a text message from an individual identifying him or herself as Ghost. The message contained a reference to a robbery. Two database records listed the subscriber for the telephone number used by the individual identifying himself as Ghost as Christopher Baum.
12. On August 23, 2016, at approximately 9:30 a.m., an employee at a branch of Western Commerce bank located at 1910 Wyoming Blvd NE, Albuquerque, NM, noticed that a blue pickup truck drove around the branch several times. The activity seemed suspicious, so the employee notified other employees, including the receptionist, of the activity. The truck parked in the parking lot of the branch, with its rear end facing the entrance of the branch. A white male individual exited the passenger side of the vehicle and entered the branch. Based on surveillance camera images and a witness description, the individual was a white male approximately six feet tall or slightly shorter and of slender build. The individual wore a red and black hooded sweatshirt without the hood worn over his head, blue jeans and sunglasses. Upon entering the branch, the individual tilted the sunglasses

up from his eyes until the lenses rested on top of his head. The receptionist has worked at the branch for many years and knows all the branch's regular customers, but did not recognize the individual. The individual looked around the branch and engaged the receptionist in a brief conversation, asking if the branch belonged to the Bank of New Mexico or if there was a Bank of New Mexico branch nearby. After the brief conversation was concluded, the individual exited the branch, walked back to the blue pickup truck and got inside. The receptionist noted that the vehicle was driven by a Hispanic female of dark hair and dark complexion, approximately 25 or 30 years old. The receptionist observed the license plate of the truck and wrote down the license plate number as EKK-93-89. The plate had a white background and black characters. Because of those colors and the fact that the number was hyphenated, the receptionist believed that the plate was from Mexico, but was unable to read any information identifying the state or country of origin of the plate.

13. On August 23, 2016, at approximately 10:15 a.m., a white male subject entered a branch of the Bank of Albuquerque located at 4201 Wyoming Blvd NE, Albuquerque, NM. Based on surveillance camera images and witnesses' descriptions, the subject was a white male approximately 5'10" or 6' tall, of slender build, with a shaved head and facial tattoos, including a spider web tattoo on his left ear and a teardrop tattoo under his left eye. The subject wore a red and black sweatshirt, blue jeans, sunglasses and dark-colored shoes. The subject's sunglasses were tilted up so that the lenses rested on top of his head. The subject approached the teller counter and made verbal robbery demands of a teller. The subject stated, "This is a bank robbery," and demanded "hundreds, fifties and twenties." The teller intended to comply with the subject's robbery demands, but the subject appeared to become impatient and exited the branch without receiving any money. Upon exiting the branch, the subject ran to a blue Dodge pickup truck which was parked outside. An individual described as a heavyset Hispanic female occupied the driver's seat. After the subject entered the vehicle, the vehicle proceeded northbound in the

parking lot and then turned left and proceeded westbound onto La Mirada Place NE until it disappeared from the view of bank employees. A bank employee used his cellular telephone to capture photographic and video images of the blue Dodge truck. In the video images, a white license plate with black characters is visible, bearing the number EKK-93-89. The FBI prepared and distributed a press release containing images of the subject of the robbery.

14. The FDIC insures the deposits of the Bank of Albuquerque, wherefore the latter institution is a bank as defined under 18 USC § 2113. The Bank of Albuquerque did not suffer a financial loss in the attempted robbery.
15. On August 23, 2016, a few minutes after the attempted robbery at the Bank of Albuquerque, a blue Dodge pickup truck entered the parking lot of a branch of Nusenda Credit Union located at 7517 Montgomery Blvd NE, Albuquerque, NM. It is noted that the branch is located approximately 0.7 mile from the aforementioned branch of the Bank of Albuquerque. The vehicle stopped facing toward the east. Surveillance camera images depict an individual exiting the passenger side of the truck and walking towards the credit union branch. The truck then proceeded eastbound to the parking lot of an adjacent 7-11 convenience store, circled the fuel pumps, proceeded westbound back to the parking lot of the Nusenda credit union and stopped, facing towards the west outside the credit union branch. At or about the same time, a subject entered the credit union branch. Based on surveillance camera images and witnesses' descriptions, the subject was a white male in his mid-thirties or early forties, approximately 6' tall and of slender build. The subject wore a black and red sweatshirt, sunglasses tilted up so that the lenses rested on top of his head, and dark-colored pants. Witnesses observed that the subject had a tattoo under his left eye. The subject approached the teller counter and made verbal robbery demands to a teller. The subject demanded "twenties, fifties and hundreds" and stated, "Now. I need them now!" The subject looked down and did not make eye contact with the victim teller. The victim teller complied with the subject's robbery demands, taking US currency from

her teller drawer and handing it over to the subject. The subject took the currency and exited the branch. He ran to the blue Dodge pickup truck and entered the vehicle on the passenger side. The truck then proceeded westbound, turned westbound onto Montgomery Blvd NE and disappeared from the view of employees and surveillance cameras. The FBI prepared and distributed a press release containing images of the subject of the bank robbery. Local news media outlets broadcast news of the robbery and images of the subject on television and on the Internet.

16. The National Credit Union Administration insures the deposits of Nusenda Credit Union, wherefore the latter institution is a credit union as defined under 18 USC § 2113. Nusenda Credit Union suffered a financial loss in the robbery.
17. On August 23, 2016, following the robbery at Nusenda Credit Union, an anonymous tipster contacted Nusenda Credit Union. The tipster identified Christopher Baum, the defendant named in the criminal complaint and arrest warrant which this affidavit supports, as the subject of the robbery which had occurred at Nusenda Credit Union earlier the same day. The tipster identified himself or herself as a family member of Baum, who had known Baum all his life. The tipster advised that he or she had seen images of the subject of the robbery on the Internet and recognized the subject as Baum. The tipster noted that the robbery subject appeared to have made no effort to cover his face, which made it easy for the tipster to recognize Baum as the subject. The tipster further noted that Baum has tattoos which match those of the subject, including a teardrop tattoo under his right eye. The tipster advised that Baum might reside at an apartment in the vicinity of Tennessee Street and Copper Avenue NE.
18. The FBI used the tipster's information to identify Baum as the defendant named in the arrest warrant and criminal complaint which this affidavit supports. Records list Baum as 6'1" tall, consistent with witness descriptions from the aforementioned robberies. In photographs, Baum appears to be of medium of slender build, consistent with witness *known to be of Baum pl by* descriptions. In a photograph dated August 2, 2016, Baum has a teardrop tattoo under his

left eye and a spider web tattoo on his left ear. In that image, Baum appears to be identical to the subject of the two robberies on August 23, 2016, based on his facial features, tattoos, the shape of his head and his facial expression.

19. On August 23, 2016, the witness who had previously advised the Albuquerque PD that an individual nicknamed Ghost had robbed the Bank of the West on August 19, 2016, re-contacted the Albuquerque PD. The witness stated that he or she had seen images from the attempted robbery of the Bank of Albuquerque and the robbery of Nusenda Credit Union earlier the same day. The witness stated that Ghost was also the subject of those two robberies.
20. From August 23 through August 25, 2016, the Albuquerque PD unsuccessfully attempted to locate Baum using physical surveillance.
21. On August 24, 2016, at approximately 6:12 p.m., surveillance cameras at a Smith's supermarket, located at 4700 Tramway Blvd NE, Albuquerque, NM, captured images of a white four-door sedan traveling northbound in the Smith's parking lot. Based on the images, the vehicle appears to be a white Pontiac G6 four-door sedan from model years 2005 through 2008. The Pontiac proceeded northbound toward the supermarket and stopped. A white male subject exited the vehicle and entered the Smith's supermarket at approximately 6:13 p.m. The Pontiac then turned around and proceeded southbound in the parking lot. Based on witness descriptions and surveillance camera images, the subject was a white male in his late twenties or early thirties, of slender or medium build and 5'6" or 6' tall. The subject wore red sneakers with white trim. Once inside the Smith's supermarket, the subject proceeded directly to the teller counter of a branch of Wells Fargo Bank, which is located inside the supermarket at the same address. A bank employee noticed that the subject had a teardrop tattoo on his face and a spider web tattoo on his left ear. The subject approached a teller and verbally demanded "Hundreds, fifties and twenties." The teller initially understood that the subject was a customer who wanted to make a withdrawal and asked him for his debit card. A second bank employee noticed

that there appeared to be a misunderstanding between the teller and the subject and approached them. When the teller asked for the subject's debit card, the subject replied, "Are you kidding me? Give me all your hundreds, fifties and twenties." The subject threatened that he had a weapon, gestured toward the waistband area of his pants and threatened to hurt or shoot people. The second employee complied with the subject's robbery demands, taking US currency from the teller's drawer and handing it over to the subject. The subject took the currency, turned and headed toward the exit of the Smith's supermarket. He began to run as he did so. The subject exited the Smith's and ran southbound through the parking lot, in the direction that the white Pontiac had traveled, until he disappeared from view of surveillance cameras. The FBI prepared and distributed a press release containing images of the subject of the bank robbery. Local news media outlets broadcast news of the robbery and images of the subject on television and on the Internet.

22. The FDIC insures the deposits of Wells Fargo Bank, wherefore the latter institution is a bank as defined under 18 USC § 2113. Wells Fargo Bank suffered a financial loss in the robbery.
23. On August 26, 2016, the Albuquerque PD located Baum using physical surveillance. While under surveillance from August 26 through August 29, Baum frequented an apartment at 448 Texas Street (St) NE, Albuquerque, NM. (It is noted that this apartment is located approximately 0.2 mile from the intersection identified by the aforementioned anonymous tipster.) On August 26, the Albuquerque PD located a gray Nissan Versa sedan with its front bumper and grill missing, consistent in appearance with the vehicle used in the robbery of Bank of the West on August 16, 2016; a blue Dodge pickup truck bearing a Mexican license plate numbered EKK-93-89; and a white Pontiac G6 four-door sedan, consistent in appearance with the vehicle used in the robbery of Wells Fargo Bank on August 24, 2016. All three vehicles were parked in the vicinity of 448 Texas St NE. On August 27, 2016, detectives of the Albuquerque PD observed Baum seated in the front

passenger seat of the blue Dodge truck bearing license plate number EKK-93-89, parked in the vicinity of 448 Texas St NE. On August 27, 2016, detectives of the Albuquerque PD observed Baum wearing red sneakers with white trim, consistent in appearance with those worn by the subject of the bank robbery at Wells Fargo Bank on August 24, 2016.

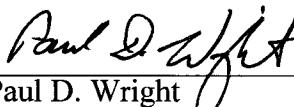
24. On August 26, 2016, the FBI presented an array of photographic images to an employee of Nusenda Credit Union, who had been at the branch at the time of the aforementioned robbery on August 23, 2016, and who had seen the subject of the robbery. One of the images was an image known to be of Christopher Baum, the defendant named in the arrest warrant the criminal complaint which this affidavit supports. The employee positively identified Baum as the subject of the robbery.
25. On August 29, 2016, the FBI presented an array of photographic images to an employee of Bank of the West, who had been at the branch at the time of the aforementioned robbery on August 16, 2016, and who had seen the subject of the robbery. One of the images was an image known to be of Christopher Baum, the defendant named in the arrest warrant the criminal complaint which this affidavit supports. The employee positively identified Baum as the subject of the robbery.
26. On August 29, 2016, the FBI presented an array of photographic images to an employee of the Bank of Albuquerque, who had been at the branch at the time of the aforementioned robbery on August 23, 2016, and who had seen the subject of the robbery. One of the images was an image known to be of Christopher Baum, the defendant named in the arrest warrant the criminal complaint which this affidavit supports. The employee positively identified Baum as the subject of the robbery.
27. On August 29, 2016, the FBI presented an array of photographic images to an employee of Wells Fargo Bank, who had been at the branch at the time of the aforementioned robbery on August 24, 2016, and who had seen the subject of the robbery. One of the images was an image known to be of Christopher Baum, the defendant named in the arrest warrant the criminal complaint which this affidavit supports. The employee

positively identified Baum as the subject of the robbery.

28. On August 29, 2016, the FBI presented an array of photographic images to the aforementioned receptionist at Western Commerce Bank, who had interacted with the individual who entered the branch on the morning of August 23, 2016. One of the images was an image known to be of Christopher Baum, the defendant named in the arrest warrant the criminal complaint which this affidavit supports. The employee positively identified Baum as the individual who had entered the branch.
29. Based on the aforementioned facts, there is probable cause to believe that Christopher James Baum committed four bank robberies and one attempted bank robbery, in violation of 18 USC § 2113. These violations of 18 USC § 2113 occurred between August 16, 2016, and August 24, 2016, in the District of New Mexico, in Bernalillo County, New Mexico.

I swear that this information is true and correct to the best of my knowledge, information and belief.

Respectfully submitted,



Paul D. Wright
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn to
before me, this 30th of August, 2016



United States Magistrate Judge
Albuquerque, New Mexico